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*Attorneys for Defendants*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
TODD MORELAND,

Plaintiff,

- against -

LIBERTY MARITIME CORPORATION,  
LIBERTY PROMISE CORPORATION, and  
LIBERTY MARITIME SERVICES CORPORATION,

Defendants.  
-----X

**Index: 2:17-CIV-7477**


**DEFENDANTS RULE 7.1 STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and to enable judges and magistrate judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel certify Liberty Maritime Corporation and Liberty Maritime Services Corporation have no parent corporation and are not publicly traded. No publically owned corporation owns 10% or more of Liberty Promise Corporation.

Dated: New York, NY  
June 18, 2018

HILL, BETTS & NASH LLP

By



Patrick O'Connor (POC-7601)

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